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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

TALIA WAGNER, an individual; THOMAS  
WAGNER, an individual,

Plaintiff,

v.

SYNCHRONY BANK, a national banking  
association; EXPERIAN INFORMATION  
SOLUTIONS, INC., a foreign corporation,

Defendant.

Case No. 2:20-cv-01596-GMN-BNW

**JOINT MOTION AND ORDER FOR  
EXTENSION OF TIME FOR  
SYNCHRONY BANK TO RESPOND TO  
PLAINTIFFS' COMPLAINT**

**(SECOND REQUEST)**

Plaintiffs Talia and Thomas Wagner ("Plaintiffs") and Defendant Synchrony Bank ("Synchrony"), by and through their respective counsel of record and pursuant to Local Rule IA 6-1, jointly move for an extension as follows:

**STATEMENT OF JOINT MOTION**

WHEREAS, Plaintiffs filed a Complaint on August 28, 2020;

WHEREAS, Synchrony was served with the Complaint on September 8, 2020;

WHEREAS, pursuant to a previous joint motion for extension of time and Order granting the motion, Synchrony's response to the Complaint is due by October 14, 2020;

WHEREAS, Synchrony needs additional time to research the allegations set forth in the Complaint and prepare a response to the Complaint;

WHEREAS, counsel for Synchrony Bank has corresponded with counsel for Plaintiffs, who agrees to this extension;

1 WHEREAS, this Joint Motion is filed in good faith and not for dilatory or other improper  
2 purpose. Plaintiffs would not suffer any prejudice by this Court permitting Synchrony the requested  
3 extension of time and have consented to the requested extension;

4 WHEREAS, this is the second request for extension of time for Synchrony to respond to  
5 the Complaint;

6 WHEREAS, Plaintiffs and Synchrony hereby agree that the deadline for Synchrony to  
7 respond to the Complaint is extended to November 4, 2020.

8  
9 Dated: October 8, 2020

**LAW OFFICE OF KEVIN L. HERNANDEZ**

10 By: /s/ Kevin L. Hernandez

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*Attorney for Plaintiffs Talia and Thomas Wagner*

16 Dated: October 8, 2020

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*Attorneys for Defendant Synchrony Bank*

23 **IT IS SO ORDERED**

24 **DATED:** 12:21 pm, October 14, 2020

25  
26 

27 **BRENDA WEKSLER**  
28 **UNITED STATES MAGISTRATE JUDGE**